

Exhibit 3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANTHONY RAPP and C.D.,

Case No. 1.20-cv-09586 (LAK)(SDA)

Plaintiffs,

RESPONSE TO DEFENDANT
KEVIN SPACEY'S FIRST SET
OF INTERROGATORIES TO
PLAINTIFF ANTHONY RAPP

-against-

KEVIN SPACEY FOWLER a/k/a/ KEVIN SPACEY

Defendant.

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**PLAINTIFF ANTHONY RAPP'S RESPONSES AND OBJECTIONS
TO DEFENDANT'S FIRST SET OF INTERROGATORIES**

PLEASE TAKE NOTICE, that plaintiff, ANTHONY RAPP, by and through his attorneys, Gair, Gair, Conason, Rubinowitz, Bloom, Hershenhorn, Steigman and Mackauf, and pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of this Court, responds and objects to Defendant, KEVIN SPACEY's, First Set of Interrogatories to Plaintiff Anthony Rapp as follows:

INTERROGATORY NO. 1: Identify all Persons listed on the page attached hereto as Exhibit A from Dr. Rocchio's background interview notes under the heading "Intimate Relationships," including Keith [illegible], Peter [illegible], "Gregory," Todd/"Justin," Rodney, Michael, and Ken Ithiphol.

RESPONSE TO INTERROGATORY NO. 1:

- Keith [illegible] is Keith Bunin. Plaintiff is not in possession of Mr. Bunin's current address. Mr. Bunin formerly resided at 264 E 10th Street, New York, NY 10009.
- Peter [illegible] is Peter Flynn. Plaintiff is not in possession of Mr. Flynn's current address. Mr. Flynn formerly resided at 264 E 10th Street, New York, NY 10009.

- “Gregory” is Gabriel Mick. Plaintiff is not in possession of Mr. Mick’s former or current address.
- Todd/“Justin” is Josh Safran. Plaintiff is not in possession of Mr. Safran’s former or current address.
- Rodney is Rodney To. Plaintiff is not in possession of Mr. To’s current address. Mr. To formerly resided at 1 Bond Street, New York, NY 10012.
- Michael is Michael Quadrino. Plaintiff is not in possession of Mr. Quadrino’s current address. Mr. Quadrino formerly resided at 1 Bond Street, New York, NY 10012.
- Ken Ithiphol is Ken Ithiphol. Mr. Ithiphol’s address is 1 Bond Street, Apt. 2A, New York, NY 10012.

INTERROGATORY NO. 2: Identify all Persons with whom You had any Communication Concerning the Alleged Incident, or to whom You disclosed the Alleged Incident, before the publication on or about October 29, 2017, of the BuzzFeed article about Your allegations, including without limitation Christopher Hart, Christopher Denny, Tracie Toms, Camryn Manheim, Elise Konialian, Elizabeth Law, and Michael McElroy whom You mentioned at Your deposition.

RESPONSE TO INTERROGATORY NO. 2: Mr. Rapp objects on the basis that the information sought is not relevant and is disproportionate to the needs to the case. Further objection is made on the basis that the demand for “all Persons” is overbroad, oppressive, and unduly burdensome. Additionally, there are more practical methods of obtaining the information sought, such as through a deposition. Finally, the information sought is duplicative to discovery previously provided by Mr. Rapp at his deposition, and in his Rule 26 Disclosures and Response to Defendants’ First Request for Production of Documents to Plaintiff Anthony Rapp.

INTERROGATORY NO. 3: Identify all Persons with whom You had any Communication Concerning the Alleged Incident, or to whom You disclosed the Alleged

Incident, after the publication on or about October 29, 2017 of the BuzzFeed article about Your allegations.

RESPONSE TO INTERROGATORY NO. 3: Mr. Rapp objects on the basis that the information sought is not relevant and is disproportionate to the needs to the case. Further objection is made on the basis that the demand for “all Persons” is overbroad, oppressive, and unduly burdensome. Additionally, there are more practical methods of obtaining the information sought, such as through a deposition. Finally, the information sought is duplicative to discovery previously provided by Mr. Rapp at his deposition, and in his Rule 26 Disclosures and Response to Defendants’ First Request for Production of Documents to Plaintiff Anthony Rapp.

INTERROGATORY NO. 4: For each Person identified in Your response to Interrogatory No. 2 or Interrogatory No. 3, describe in detail the substance and date of every Communication between You and that Person Concerning the Alleged Incident.

RESPONSE TO INTERROGATORY NO. 4: Mr. Rapp objects on the basis that the information sought is not relevant and is disproportionate to the needs to the case. Further objection is made on the basis that the demand is overbroad, oppressive, and unduly burdensome. Further objection is made on the basis that the information sought is duplicative to discovery previously provided by Mr. Rapp at his deposition. Finally, the information sought seeks long, narrative responses and there are more practical methods of obtaining the information sought, such as through a deposition.

INTERROGATORY NO. 5: For each Communication identified in Your response to Interrogatory No. 4, describe in detail the circumstances of the Communication, including without limitation the means by which the Communication occurred (e.g., in person, telephone,

text message), the locations of all Persons involved in the Communication, and the purpose and/or reason for the Communication Concerning the Alleged Incident.

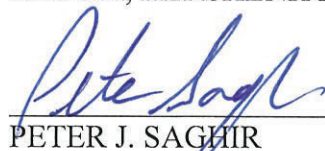
RESPONSE TO INTERROGATORY NO. 5: Mr. Rapp objects on the basis that the information sought is not relevant and is disproportionate to the needs to the case. Further objection is made on the basis that the demand is overbroad, oppressive, and unduly burdensome. Further objection is made on the basis that the information sought is duplicative to discovery previously provided by Mr. Rapp at his deposition. Finally, the information sought seeks long, narrative responses and there are more practical methods of obtaining the information sought, such as through a deposition.

PLEASE TAKE FURTHER NOTICE that Plaintiff, ANTHONY RAPP, reserves the right to supplement this Response to Interrogatories.

As to objections:

Dated: New York, New York
July 15, 2021

Yours etc.,
GAIR, GAIR, CONASON, RUBINOWITZ,
BLOOM, HERSHENHORN, STEIGMAN & MACKAUF



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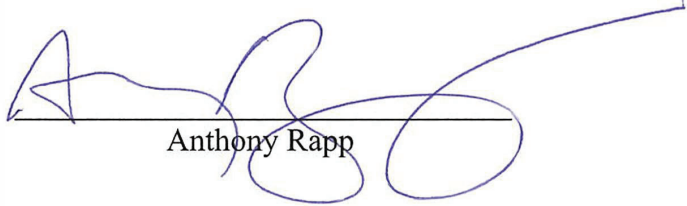
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VERIFICATION OF INTERROGATORIES

My name is Anthony Rapp. I am the plaintiff in this matter. I have reviewed the answers to the First Set of Interrogatories to Plaintiff Anthony Rapp as set out in this document.

I declare under penalty of perjury under the laws of the United States of American that the foregoing is true and correct to the best of my knowledge.

Executed on July 15, 2021



Anthony Rapp

CERTIFICATE OF SERVICE

I, Angella Ibishaj, hereby certify that on July 15th, 2021 I served the foregoing document by (1) electronic mail to all counsel at their e-mail addresses listed below and (2) U.S. mail in accordance with Fed. R. Civ. P. 5(b)(2) to all counsel at their addresses listed below:

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Angella Ibishaj